

# ***Security Issues for Spent Fuel Storage***

***Storage and Transportation Subcommittee  
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Nuclear Future  
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# Overview

- **NRC regulations and security orders establish requirements for the protection of spent nuclear fuel (SNF) in storage**
- **Security requirements provide high assurance of adequate protection of -**
  - **Public health and safety**
  - **Common defense and security**
  - **Environment**



# **Storage Rulemaking**

- **Independent spent fuel storage installation (ISFSI) security rulemaking is intended to address -**
  - **Generic applicability of post 9/11/2001 orders**
  - **Lessons learned from previous NRC inspections**
  - **Regulatory consistency and clarity issues for both types of ISFSI licenses (general & specific)**
- **Hardened on site storage (HOSS)**
  - **Not a “term of art” used by the NRC**
  - **Raised in Petition for Rulemaking PRM-72-6**
  - **To be addressed in the ISFSI security rulemaking**



# ***Rulemaking (cont.)***

- **Rulemaking development underway**
  - Draft regulatory basis issued for public comment in December 2009
  - Significant comments received opposing several key technical approaches
- **Staff seeking direction from Commission before proceeding further**
  - Staff paper SECY-10-0114 (08/26/2010)
  - ADAMS Package No. ML101960614

<http://www.nrc.gov/reading-rm/doc-collections/commission/secys/2010>



# ***Protective Strategy***

- **Protective strategy achieved through security personnel, weaponry, and security systems**
  - Tradeoffs of hardware vs. personnel possible
  - Capital costs vs. O&M costs
- **Denial strategy**
  - Interpose, interdict, and neutralize threat
- **Detect, assess, and communicate strategy**
  - Licensee requests help – local law enforcement responds and resolves threat



# ***Potential Impacts***

- **Denial strategy, if required, for some or all ISFSIs could have very large capital and/or O&M cost impacts**
- **Distance from storage facility to site boundary varies widely**
  - **Ability to implement certain security solutions may vary widely**



# Summary

- **The NRC's rulemaking process is still in an early stage**
- **Changes in technical direction may significantly impact costs**
- **Costs to licensees and NRC still being assessed**